

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MARY M. TARDIF,

Plaintiff,

**NOTICE OF MOTIONS IN
LIMINE**

-against-

13 Civ. 4056 (KMW)(KNF)

CITY OF NEW YORK, NEW YORK CITY POLICE
DEPARTMENT, INSPECTOR JOHN O'CONNELL, DEPUTY
INSPECTOR EDWARD WINSKI, POLICE OFFICER JAMES
MCNAMARA, POLICE OFFICER ALENA AMINOVA,
POLICE OFFICER KENDAL CREER, POLICE OFFICER
MARSHA RUMBLE, POLICE OFFICER FELIX SCHMIDT,
DEPUTY INSPECTOR DANIEL MULLIGAN, SERGEANT
THOMAS MCMANUS, AND JOHN DOE NYPD OFFICERS
##1-9,

Defendants.

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PLEASE TAKE NOTICE that upon the Declaration of Brachah Goykadosh, dated January 16, 2018, and the exhibits annexed thereto, the Memorandum of Law dated January 16, 2018, and upon all prior pleadings and proceedings had herein, defendants City of New York, Sergeant McManus, Police Officer Schmidt, and Police Officer Rumble will move this Court before the Honorable Kimba M. Wood, United States District Judge, at the Daniel Patrick Moynihan United States Courthouse for the Southern District of New York, located at 500 Pearl Street, New York, New York 10007, in advance of trial for an Order pursuant to the Federal Rules of Evidence to exclude certain evidence at trial, and for further rulings regarding the admissibility of certain evidence, and relief as this Court may deem just, proper, and equitable.

PLEASE TAKE FURTHER NOTICE that pursuant to the Court Order dated November 27, 2017, plaintiff's opposition is due by February 6, 2018, and defendants' reply, if any, is due by February 20, 2018.

Dated: New York, New York
January 16, 2018

ZACHARY W. CARTER
CORPORATION COUNSEL OF THE CITY OF NEW YORK
Attorney for Defendants
100 Church Street
New York, New York 10007
(212) 356-3523

By: /s/
Brachah Goykadosh
Assistant Corporation Counsel
Special Federal Litigation Division

cc: All counsel of record (by ECF only)

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NOTICE OF MOTIONS *IN LIMINE*

ZACHARY W. CARTER
Corporation Counsel of the City of New York
Attorney for Defendants
100 Church Street
New York, New York 10007

Of Counsel: Brachah Goykadosh
Tel: (212) 356-3523

Due and timely service is hereby admitted.

New York, New York....., 2018 . . .

..... Esq.

Attorney for.....